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HILL ENVIRONMENTAL GROUP, INC.

Environmental & Engineering Services

September 22, 2003

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Goodrich Corporation
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2730 West Tyvola Rd.
Charlotte NC 28217-4578

Subject:

Groundwater-Quality Evaluation-

Chemical Waste Management Site, Newark NJ

Former Hilton Davis Site, Newark, NJ

Dear Mr. Amig:

During our May 21, 2003 meeting with the New Jersey Department of Environmental Protection (NJDEP) concerning groundwater quality issues at the former Hilton Davis (HD) site in Newark, it was agreed that a review should be performed of documents pertaining to groundwater conditions at the adjacent Chemical Waste Management (CWM) Site to determine if any groundwater contamination detected at the CWM site were negatively impacting the groundwater quality at the former Hilton Davis site. Therefore, on behalf of Goodrich Corporation, Hill Environmental Group, Inc. (HILL) has reviewed the following document:

Remedial Action Work Plan (RAWP) Chemical Waste Management of New Jersey – Newark Facility GeoTrans, Inc. November 6, 2002

The attached Figure 1 (based on a City of Newark tax map) shows the former HD property (Lot 56) and the CWM property (Lots 19 and 31), and their relationship to the Passaic River, Lister Avenue, and surrounding properties.

Data from the RAWP were compared with January 2003 groundwater sampling data for the HD site, presented in the HILL April 2003 Groundwater Sampling Data report.

It was found that shallow groundwater from the CWM site flows onto portions of the HD site, impacting groundwater quality at the HD site.

Groundwater Flow

The CWM RAWP contains a series of maps showing concentrations of various constituents detected in shallow groundwater samples. The base map contains shallow groundwater contours, generated based on water level measurements taken on September 9, 2002. An example of these maps (Figure 2.1 showing benzene concentrations) is attached.

HILL developed a water table (i.e., shallow groundwater) contour map for the HD site based on measurements taken on January 21 and 22, 2003 (Figure 3). This HD map was compared to the CWM shallow groundwater contour map based on the September 9, 2002 data.

Although the water level measurements at the two sites were taken on different dates, the two maps are quite consistent. When appropriately scaled and superimposed, it was discovered that with only minor adjustments, a shallow groundwater contour map could be developed that combines the two data sets (Figure 4). (Note that because the focus of this evaluation is on potential impacts to the HD site, only the groundwater contours and well locations from the eastern portion of the CWM site (i.e. Lot 31) are shown on Figure 4.)

As can be seen by examination of Figures 2.1, 3 and 4, the contours on the combined map are consistent from the CWM site to the HD site, both in terms of groundwater elevations as well as orientation.

Figure 4 also shows that shallow groundwater from the northeastern portion of the CWM site (the northern portion of Lot 31) flows in a northwesterly direction onto the HD site.

Groundwater Quality Impacts

Based on the January 2003 sampling results at the HD site, several organic constituents are present in HD site groundwater at concentrations above NJDEP Class IIa groundwater quality criteria. These organic constituents were compared to those found in groundwater at the CWM site. Based on this comparison, it was determined that the following constituents detected in groundwater at the CWM site could be impacting groundwater quality at the HD site:

- Benzene
- Chlorobenzene
- 1.4-Dichlorobenzene
- Semi-Volatile Organics Tentatively Identified Compounds

For each of the above constituents, a map was prepared showing posted constituent concentrations superimposed onto the combined shallow groundwater contours (Figures 5 through 8). For each map, CWM data are from the November 6, 2002 GeoTrans, Inc. report (for samples collected in August 2002); and HD site data are from the April 2003 Groundwater Sampling Data report (for samples collected in January 2003).

Benzene and Chlorobenzene

Because the occurrence of benzene and chlorobenzene on both the CWM site and the HD site are similar, they will be considered together. Figure 5 shows posted benzene concentrations and Figure 6 shows posted chlorobenzene concentrations.

It is highly likely that benzene and chlorobenzene concentrations in HD monitoring wells MW-6 and MW-8 (as well as the lower concentrations in MW-3) are associated with the high benzene and chlorobenzene detections in upgradient CWM monitoring points. This conclusion is based on the fact that the groundwater in an area on the CWM site with



high benzene and chlorobenzene concentrations (i.e., the vicinity of CWM monitoring points MW-4, GP-1 and GP-2) flows downgradient towards the vicinity of MW-6 and MW-8 on the HD site, a distance of less than 100 feet.

HD monitoring wells MW-2 and MW-3 (which contain concentrations of benzene and chlorobenzene above NJDEP Class IIa aquifer criteria) are not directly downgradient from the CWM site. However, it is possible that local variations in groundwater flow may be present (and/or that groundwater flow directions may change somewhat through time). Therefore, it is possible that the detections of benzene and chlorobenzene in MW-2 and MW-3 are also associated with detections at the CWM site. (Note: Goodrich is pursuing the installation of a monitoring well upgradient from MW-2 on the Benjamin Moore property. Data from this well will clarify the source of the MW-2 detections.)

Note that neither benzene nor chlorobenzene were associated with operations at the former HD site; and further, that the benzene and chlorobenzene detections in the groundwater at the HD site can be fully attributed to one or more off-site sources.

1,4-Dichlorobenzene

Figure 7 shows posted 1,4-dichlorobenzene (1,4-DCB) concentrations. The only HD site monitoring well with 1,4-DCB above standards is MW-6 (94.2 μ g/l). Note that on the CWM site, only GP-10 has a 1,4-DCB detection (160 μ g/l); however, other results show high detection limits (especially when compared to the 94.2 μ g/l in MW-6).

It is likely that 1,4-DCB in HD monitoring well MW-6 is associated with groundwater from the CWM site, considering:

- The ratio of chlorobenzene to 1,4-DCB in CWM monitoring point GP-10 is 10:1 (1600 μg/l); the ratio of chlorobenzene to 1,4-DCB in HD monitoring well MW-6 is approximately 10:1 (991 μg/l) to 94.2 μg/l).
- Chlorobenzene and 1,4-DCB are related compounds, i.e., reasonably expected to occur together.
- Because of extremely high concentrations of chlorobenzene detected in CWM monitoring points GP-1 and GP-2, high detection limits for 1,4-DCB are present for these monitoring points. Although 1,4-DCB is listed as not detected, it is likely that concentrations of 1,4-DCB are present, but below detection limits. (Presuming the 10:1 ratio discussed above, the 1,4-DCB would be just below detection limits at GP-1 and GP-2).

Note that 1-4 DCB is not associated with operations at the former HD site; and further, that the 1-4 DCB detections in the groundwater at the HD site can be fully attributed to one or more off-site sources.

Semi-Volatile Organics - Tentatively Identified Compounds (SVOC TICs)

Figure 8 shows posted concentrations of SVOC TICs. It is highly likely that the concentration of SVOC TICs in HD monitoring well MW-6 is associated with SVOC TICs detected in CWM monitoring points. It is possible that concentrations of SVOC TICs detected in other HD monitoring wells are also associated with the CWM detections.



Although SVOCs were historically utilized at the HD site, the SVOC TIC detections in the groundwater at the HD site can be fully attributed to one or more off-site sources.

Summary of Conclusions

Shallow Groundwater Flow

Based on an analysis of shallow groundwater elevations at both the CWM site and the HD site, it was determined that shallow groundwater from the northeastern portion of the CWM site (the northern portion of Lot 31) flows in a northwesterly direction onto the HD site (Figure 4).

Groundwater Quality Impacts

It is likely that several constituents detected at concentrations above NJDEP Class.IIa groundwater quality criteria at the HD site have been impacted by groundwater quality at the upgradient CWM site. These constituents are:

- Benzene,
- Chlorobenzene,
- 1,4-Dichlorobenzene, and
- Semi-Volatile Organics Tentatively Identified Compounds

Benzene, chlorobenzene and 1,4-dichlorobenzene are not associated with operations at the former HD site and the detections of these compounds at the HD site can be fully attributed to one or more off-site sources.

Although SVOCs-were-historically utilized at the HD site, the SVOC TIC detections in the groundwater at the HD site can be fully attributed to one or more off-site sources.

Please feel free to give me a call if you need anything further.

Very Truly Yours,

HILL ENVIRONMENTAL GROUP, INC.

J. Gregory Hill, P.E., P.G.

Technical Director

c: Gail Helfrick, Quantum



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